

Date Filed 12/9/2022 2:49 PM  
 Superior Court - Worcester  
 Docket Number 2285CV00701

E-FILED

COMMONWEALTH OF MASSACHUSETTS  
 Worcester, SS.

SUPERIOR COURT DEPARTMENT  
 CIVIL ACTION NO. 2285CV00701 A

Valentin Komarovskiy,  
 Plaintiff

v.

Celsius Network LLC

Defendant

FILED

DEC 09 2022

ATTEST

CLERK

## MOTION To Amend Complaint

Plaintiff moves this Court to Amend his Complaint. In support hereof the plaintiff  
 state as follows:

1. No responsive pleading has been filed, s this amendment ought to be as of right.
2. Moreover, defendant Celsius has filed for Chapter 11 bankruptcy protection, so this action is stayed as to them, so the plaintiff cannot proceed under Rule 9A.
3. The amendment seeks only to add new individual defendants, who upon information and belief, had not filed bankruptcy, and new counts against them only for tortious interference with contracts and fraud.
4. The only other changes to the complaint are in the Count heading to clarify against which defendants the count is being brought.

Respectfully submitted,

Valentin Komarovskiy

By his Attorneys

/s/ Robert H. Bowen  
 Robert H. Bowen  
 BowenBowen PC  
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 (978) 582-0050  
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Dated: December 9, 2022

A true copy by photostatic process  
 Attest:  
 Asst. Clerk

E. Th...th

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12/22/22 Denied without prejudice, for failure to serve proposed new parties, as required by Superior Court Rule 9A(b)(1)(ii). Ignored.

Notices Mailed 12/12/22